

FACT SHEET
SARGENT & GREENLEAF, INC.
JESSAMINE COUNTY, NICHOLASVILLE, KY
EPA I.D. # KYD 068 332 147
Agency Interest #2301

This fact sheet is prepared for the Clean Closure Equivalency Demonstration that the Kentucky Environmental and Public Protection Cabinet (Cabinet) Division of Waste Management (Division) intends to approve for the Sargent & Greenleaf, Inc. (Sargent & Greenleaf) company located at One Security Drive in Nicholasville, Jessamine County, Kentucky.

I. Purpose of the Approval Process

The purpose of the approval process is to afford the Cabinet, interested citizens and other governmental agencies the opportunity to evaluate the work performed by Sargent & Greenleaf in demonstration that they have met clean closure equivalency standards. The Cabinet is required to review all pertinent information related to this demonstration. This review work has been performed by Cabinet personnel. The public is now provided thirty (30) days to review this information and comment on this work prior to the Cabinet issuing final approval. Public health, safety and environmental aspects of the proposal have been considered in the review of the Clean Closure Equivalency Demonstration.

II. Procedures for Reaching a Final Decision

The Cabinet will coordinate the issuance of approval of the Clean Closure Equivalency Demonstration. Kentucky Administrative Regulation 38:010, Section 1(f)1, Title 401, requires that the public be given a thirty (30) day comment period after the Cabinet provides tentative approval of the Clean Closure Equivalency Demonstration. The comment period began on June 15, the date of publication of the public notice in the Jessamine Journal, a major local newspaper of general circulation. The public comment period will end on July 18. Any person interested in commenting on the tentative approval must do so within the thirty (30) day comment period mentioned above. All persons wishing to comment on any aspect of the Clean Closure Equivalency Demonstration should submit comments, in writing, to April J. Webb, P.E., Manager, Division of Waste Management, Hazardous Waste Branch, 14 Reilly Road, Frankfort, Kentucky 40601. Electronic comments may be submitted to: [Dede Grisham@ky.gov](mailto:Dede.Grisham@ky.gov). The Cabinet will consider all comments received during the comment period in formulating a final decision. A public hearing will only be held if the Cabinet receives a request for a hearing before the close of the public comment period. If a hearing is requested, the Cabinet will issue another notice and automatically extend the public comment period to the close of business on the date the public hearing is held. At that time, the Cabinet will designate a presiding officer to conduct the hearing in an orderly manner. Reasonable limits may be set on the time allowed for oral statements. The meeting facility will also be accessible to persons with disabilities. To request appropriate accommodations for the public hearing (such as an interpreter) contact Dede Grisham at (502) 564-6716, ext. 163.

The administrative record, which includes a copy of the Clean Closure Equivalency Demonstration, can be reviewed at the Jessamine County Library, 600 South Main Street., Nicholasville, KY, 40356-3523. The library contact person is Susan Lawrence, and she can be reached at (859) 885-3523. This information can also be reviewed at the Division of Waste Management's Frankfort office between 8:30 a.m. and 4:00 p.m., Monday through Friday by appointment only. To make an appointment, submit a written request to Ms. Maria Wood at least 72 hours prior to the desired review date. Requests can be faxed to (502) 564-9232 or mailed to Ms. Wood at the Division of Waste Management, 14 Reilly Road, Frankfort, Kentucky 40601. Copying charges are 10 cents per page and \$3 for each map. Upon request, this information can be made available in alternative formats.

The Kentucky Division of Waste Management does not discriminate on the basis of race, color, national origin, sex, religion, age, or disability in the provision of services. The Cabinet provides, upon request, reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities. To request alternative formats for printed information, and/or to be placed on the Hazardous Waste Branch's mailing list to receive relevant updates on this matter, contact Dede Grisham at (502) 564-6716, ext. 163.

After consideration of all oral and written comments and requirements of Kentucky Revised Statutes and appropriate regulations, the Secretary of the Environmental and Public Protection Cabinet will make the final decision regarding approval of the Clean Closure Equivalency Demonstration. If the tentative decision to issue approval is substantially changed, the Cabinet will issue a public notice indicating a revision of decision. If the tentative decision to issue a permit is substantially unchanged from those announced in the public notice, notification will be given to the regulated entity and each person who has submitted comments or has requested notice of the final decision.

Any person who may be aggrieved by the approval of the Clean Closure Equivalency Demonstration may file a petition with the Cabinet, which sets forth the grounds of the objection and the demand for a formal hearing pursuant to KRS 224.10-420(2). This type of hearing is held before a hearing officer. All parties are advised to have legal counsel present.

III. Facility Description

The Sargent & Greenleaf facility is located in Nicholasville, KY. The company has conducted operations at the property since 1974. Products manufactured include locks, security devices and associated materials. From 1975 to 1991, an on-site finishing department was utilized. In 1992 all electroplating and painting needs were contracted out to other companies.

In 1975 a surface impoundment was constructed to allow for the settling of solids from pre-treated wastewater prior to disposal to the municipal sewer system. This wastewater was a listed hazardous waste known as U.S. EPA waste number F006 (wastewater

treatment sludge from electroplating operations). The basis for this material being a listed waste is the content of cadmium, hexavalent chromium, nickel and complexed cyanide. Closure of the surface impoundment was initiated in March, 1984. Sludge was solidified with lime, excavated and disposed of in a landfill in Williamsburg, Ohio. Following removal of the contaminated materials, samples were obtained from the bottom of the excavation and the excavation was backfilled and returned to pre-unit grade.

In January, 2000, Sargent & Greenleaf collected samples from the interior of the unit and from background locations. This effort was the beginning of the Clean Closure Equivalency Demonstration. After several rounds of investigation, it was determined that the potential contaminants (cadmium, cyanide, chromium, nickel and zinc) were present below background and/or their respective health-based limit.

Beginning in 2003, groundwater samples were obtained from two wells, MW-2B and MW-5B, both downgradient of the former surface impoundment. Samples were collected on a quarterly basis from these wells until the end of 2005. The sampling was originally slated to be performed for only a year, but detections of trichloroethene (TCE) were detected at concentrations slightly above the Maximum Contaminant Level (MCL) in well MW-5B, so sampling was continued to establish whether or not a problem existed. After numerous sampling events, the concentrations of TCE were shown to consistently remain below the MCL. At this point, Sargent & Greenleaf submitted the Final Clean Closure Equivalency Demonstration Report.